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May 31, 2012

**By ECF**

The Honorable Michael A. Shipp, U.S.M.J.  
U.S. District Court for the District of New Jersey  
Martin Luther King, Jr. Federal Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07101

Re: *In re Merck & Co., Inc. Secs., Deriv. and ERISA Litig.*,  
Civil Action Nos. 05-1151; 05-2367 (SRC)(MAS)

Dear Judge Shipp:

We write on behalf of the Lead Plaintiffs in the above-referenced securities class action regarding the letter we submitted to Your Honor on May 25, 2012 outlining certain discovery disputes with Defendants, as well as Defendants' May 29, 2012 letter to Your Honor complaining that our May 25 letter was not in compliance with Your Honor's Individual Practices. In view of that correspondence, the Plaintiffs are prepared to follow whatever guidance Your Honor has on how the parties should proceed regarding the discovery issues raised by our May 25 letter.

In order to avoid any undue delay, and consistent with Defendants' proposal in their May 29 letter, we would propose that Defendants submit a response to our May 25 letter no later than June 6, 2012. Considering that the parties have been discussing these issues previously, we believe that that is more than adequate time to address the issues before the Court.

Thank you for the Court's consideration of this matter. If the Court wishes to discuss the matter further, we are available at your convenience.

Respectfully submitted,

CARELLA, BYRNE, CECCHI,  
OLSTEIN, BRODY & AGNELLO

/s/ James E. Cecchi

JAMES E. CECCHI

cc: All Counsel (by ECF)